

Subject: Andrews v. Tri Star Outstanding Discovery Issues
Date: Monday, March 7, 2022 at 9:41:55 AM Central Standard Time
From: Betsy Hart
To: Daniel Arciniegas, roland@mumfordlaw.net
CC: Tara Swafford
Attachments: image001.jpg

Daniel,

We still have not received complete responses to interrogatory nos. 8-13 and 18 from your client. As outlined in our January 27, 2022 letter and as we have discussed by phone, our client is entitled to information regarding Ms. Andrews's medical history and job history, both before and after she was laid off. We have received no information regarding Ms. Andrews's attempts to get a job following her lay off. If she did not apply for any jobs, please tell us that. This litigation cannot move forward if your client will not participate in the discovery process. If we do not have complete responses to these interrogatories by Wednesday, March 9, 2022, along with signed releases for medical and employment records, we will have no choice but to begin the discovery dispute process. We are happy to discuss by phone again if you believe that would be productive, but we will be unable to move the March 9 deadline, as this issue has been outstanding for nearly six weeks. Our ability to schedule and complete depositions under the case management schedule is now in jeopardy. Thanks.



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